

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

County of Monroe v. Purdue Pharma L.P., et al.
Case No. 1:18-op-45158

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MANUFACTURER
DEFENDANTS' JOINT MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED
COMPLAINT**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Evidence 201, the Manufacturer Defendants hereby request that the Court take judicial notice of the following document in support of the Manufacturer Defendants' Joint Motion to Dismiss Plaintiff's Second Amended Complaint. All exhibit references correspond to the exhibit attached to the Declaration of Brien T. O'Connor, filed contemporaneously in support of the above-referenced motion.

1. Exhibit A: A Michigan Department of Attorney General press release entitled *Schuette Opens Investigation into Opioid Manufacturers and Distributors* (Sept. 9, 2017).

This exhibit is properly subject to judicial notice. Courts routinely take judicial notice of press releases (Exhibit A). *See, e.g., Beaver Cty. Ret. Bd. v. LCA-Vision Inc.*, 2009 WL 806714, at *7 (S.D. Ohio Mar. 25, 2009) (finding that accuracy of press releases cannot be reasonably questioned, and noting that "[p]ress releases also are self-authenticating under evidentiary rule 902(6)").

WHEREFORE, the Manufacturer Defendants respectfully request that the Court take judicial notice of the abovementioned exhibit.

Dated: June 8, 2018

Respectfully submitted,

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** denotes national counsel who will seek pro
hac vice admission*

CERTIFICATE OF SERVICE

I hereby certify that on the 8th of June, 2018, I electronically filed the forgoing with the Clerk of the Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF systems.

Dated: June 8, 2018

/s/ Brien T. O'Connor

Brien T. O'Connor